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LI CHEN and YI LI

Seeking ‘A Fair Field’ for Women in the Legal Profession: Pioneering Women Lawyers from Burma of 1924-1935¹

ABSTRACT

The enactment of the Sex Disqualification (Removal) Act in 1919 tore down a significant gender barrier and opened doors of the once exclusively male legal profession in the United Kingdom. This article focuses on its early beneficiaries in Burma, a less studied colony of the Empire in the late 1920s and early 1930s. It traces the first four women barristers from colonial Burma, and their odyssey to gain tradecraft and skills through seeking legal education at the Inns of Court in London. It evaluates their performances at the Bar Examination and explores the challenges they faced as they beat a path into the traditionally male-dominated legal profession. Finally, the paper shows how these pioneering women barristers were able to utilise the fruits of their legal education to further the cause of promoting gender equality upon their return to Burma. However, their professional success also reveals the persistence of gender and racial hierarchies across the Empire despite ongoing legal reformation and political activism, as they were subjected to confrontations and discriminations throughout their career.

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Keywords: Burma, women lawyers, female education, colonialism, gender equality, Inns of Court

Introduction

Women only attained the right to join the legal profession on equal footing with men when the UK Parliament legislatively eliminated sex discrimination for the admission in the legal profession by the celebrated Sex Disqualification (Removal) Act of 1919.² Years of the fierce fight waged by some fearless British women had finally brought about an unprecedented opportunity for women to become full-fledged members of the legal profession.³ In 1923, a year after Ivy Williams, the first Englishwoman to gain the coveted title of barrister at law in England and Wales on 10 March 1922,⁴ two women of British India, Mithan Ardeshir Tata⁵ and Cornelia Sorabji⁶ followed suit and were called to the English Bar.⁷ Their achievements were reported variously by the *Times of India*,⁸ a well-established broadsheet with wide circulation in British India, including Burma.

Possibly encouraged by the pervasive coverage of these pioneering heroines, young women from Burma, then a province of British India, also stepped up to the game. By

² Patrick Polden, 'Portia's Progress: Women at the Bar in England, 1919–1939', *International Journal of the Legal Profession*, 12, no. 3 (2005): pp. 293–338. This landmark legislation provided that '[a] person shall not be disqualified by sex... for admission to any incorporated society...'

³ See Mossman Mary Jane, *The First Women Lawyers: A Comparative Study of Gender, Law and the Legal Professions* (Oxford, 2006).

⁴ 'First Woman Barrister: Miss Ivy Williams Called to The Bar', *The Times of India*, 23 May 1922, p. 10.

⁵ Lincoln's Inn, and P. V. Baker, *The Records of the Honourable Society of Lincoln's Inn, The Black Books*, Volume VI, A.D. 191–A.D. 1965 (London, 2001), p. 754. She was called to the Bar on 26 January 1923.

⁶ She was called to the Bar on 23 April 1923.

⁷ 'Miss Mithan Ardeshir Tata, The First Indian Lady Barrister', *The Times of India*, 20 January 1923, p.15.

⁸ Ibid.

1935, four women from British Burma had blazed a trail in seeking legal education in London and returned home, each bearing the coveted title of barrister at law. Two of them had also been awarded the titular degree of Bachelor of Arts from Newnham College, University of Cambridge.⁹ This paper thus seeks to bring to light the neglected stories of these trailblazing women from an Asian colony who were beneficiaries of the monumental Act. Previous works have explored the experiences and lives of a few notable pathbreaking British, Irish, and Indian women lawyers.¹⁰ A fuller legal history of the Empire, however, calls for an exploration of the lives and experiences—even their very existence—of early women lawyers from Southeast Asia who embarked on legal education in England and were called to the Bar. This is especially so because such an inquiry adds to recent scholarship on women’s history in colonial Burma that charts the nuanced framework needed to strike a balance between the image of pre-modern, autonomous Burmese women, and the modern women that were heavily influenced by globalisation from the early twentieth century.¹¹ Colonial observers and early historiography identify ‘women’s relatively “high status” ...as a regional feature’¹² of Southeast Asia, and their social and financial equality to their male counterparts, a unique position when compared with their ‘oppressed’ sisters in other parts of contemporary Asia such as India and China. Yet it is also vital, as a historian of Southeast Asia, Chie Ikeya points out, to acknowledge ‘customs and representations unfavourable to women’¹³ in Burmese and Buddhist traditions. Similarly, as a specialist of women in modern Burma, Tharaphi Than challenges the notion of Burmese women’s independence and liberty, asking ‘why very few powerful women existed’, thus implies the subtle reality that the majority were not indeed ‘powerful’.¹⁴

This paper presents a biographical sketch of four women lawyers from Rangoon, the

⁹ Rita McWilliams Tullberg, *Women at Cambridge* (Cambridge, New York, 1998), pp. 1, 155, 175, 183, 218. Since women were refused the status of full university members and were excluded from receiving a full-fledged degree until 1948, these awards were only considered partial or titular degree.

¹⁰ See Erika Rackley and Rosemary Auchmuty, ed., *Women’s Legal Landmarks Celebrating the History of Women and Law in the UK and Ireland* (Oxford, 2019); Rosemary Auchmuty, ‘Early Women Lawyers at Cambridge and Oxford’, *The Journal of Legal History*, 29, no. 1 (2008): pp. 63-97; Suparna Gooptu, *Cornelia Sorabji: India’s Pioneer Woman Lawyer: a Biography* (Oxford, 2010).

¹¹ For recent discussions on women’s history in Southeast Asia, see Barbara Andaya, ‘Studying Women and Gender in Southeast Asia’, *International Journal of Asian Studies*, 4, no. 1 (2007): pp. 113–36; for women in Burma, see Chie Ikeya, *Refiguring Women, Colonialism, and Modernity in Burma* (Honolulu, HI, 2011) and Tharaphi Than, *Women in Modern Burma* (London, 2014).

¹² Andaya, p. 114.

¹³ Ikeya, p. 51.

¹⁴ Than, p.1.

capital of colonial Burma, in the interwar years, by following their legal education and career development in Britain and Burma. These four well-educated, professional women exemplified the ‘women of the *khit kala*’ (women of the time)¹⁵ or the ‘Modern Girl’ that emerged and thrived in cosmopolitan port cities in Southeast Asia, who were viewed as personifying ‘the inclusiveness, fluidity and interchange among its culturally diverse citizens and with the rest of the world’.¹⁶ They embodied the global modernity of the interwar period that connected imperial metropole and colonial periphery through their elite education, international travel, and public advocacy.

In examining their pursuit of legal education and inclusion in the legal profession, this article places significant reliance on archival materials scattered at four Inns of Court as well as the Archives of Council of Legal Education at the Institute of Advanced Legal Studies in London. These materials hold the key to these pioneer women lawyers’ fascinating stories. The Inns exercise the exclusive right of admitting persons to practice law as barristers by a formal call to the Bar upon the passing of the requisite exams, and to further that charge the Inns organized the Council to make uniform regulations on the training of students and the administration of regular examinations for these students.¹⁷ Each Inn maintained historical registers of admission as well as governing bodies’ meeting minutes with skeletal information of each admitted persons. Sometimes, these student members’ admission and call files with varying degrees of details survived. Whenever these students took the exam, the Council would have a record of their exam performance. Although the information obtained from this set of institutional, English-language sources is limited in perspective and is far from adequate to paint a complete and balanced picture of these pioneering women lawyers, it nevertheless allows us to glimpse at certain moments of their lives at the ‘imagined site of gender equality’¹⁸ of British Burma, especially how they were viewed in the eyes of metropolitan institutions.

This article highlights the challenges they encountered as minorities at the Inns of Court in London, and how they brought the professional experience obtained in the metropole

¹⁵ Ikeya, p.3.

¹⁶ Su Lin Lewis, ‘Cosmopolitanism and the Modern Girl: A Cross-Cultural Discourse in 1930s Penang’, *Modern Asian Studies*, 43, no. 6 (2009): p. 1415.

¹⁷ *A New Guide to the Bar: Containing the Most Recent Regulations and Examination Papers and a Critical Essay on the Present Condition of the Bar of England* (London, 1914), pp. 25-69.

¹⁸ Lucy Delap, ‘Uneven Orientalisms: Burmese Women and the Feminist Imagination’, *Gender & History*, 24, no.2 (2012): p. 389.

back home as members of an elite group representing their gender. Two issues underline their stories: female education and gender equality. Ikeya demonstrates a colonial contradiction in these two intricately related issues, pointing out that although Burmese women were hailed for their autonomous status, they had to receive education to be qualified for equal rights.¹⁹ Lucy Delap further reminds us to be careful when applying a Western-dominated feminist view here, because the contemporary society insisted that education—that is, Western education—was ‘essential to female emancipation’.²⁰ Western education itself was often the result of a civilising project to justify colonial rule over the native population. As this paper shows, our protagonists benefited tremendously from the best Western education available at the time, which opened the door for them to practice law on an equal footing with men, and qualified them to play critical roles in seeking equal rights for their fellow Burmese women on the main political stage of the colony. Their experiences seem to adhere, or at least were portrayed according to, the imperial feminist view that is Eurocentric by nature.

It is also significant that among the four women, only one was ethnic Bamar, the major ethnicity of Burma. The rest were from Indian families who migrated to Burma after its annexation by the British in the nineteenth century. It is even more interesting to note that among the three Indian women from Burma, two can be identified as Parsis, the descendants of migrants from Iran, who had been well-established in South Asian cities such as Bombay by the early twentieth century, while one was an Anglo-Indian (Anglo-Parsi). This accurately reflects the cosmopolitan nature of Rangoon under British rule. As the Empire expanded, people of multiple ethnicities, religions, professions, and social statuses flowed steadily into Burma from neighbouring regions. By the turn of the twentieth century, more than half of Rangoon’s population was born in India,²¹ resulting in a complex demographic composition of an Indian city on Burmese soil. Colonial Burma, as Yi Li examines in the case of its Chinese migrants, held a ‘peculiar position’²² for its multi-ethnic colonial subjects, sitting at the intersection of several transnational networks. Personally embodying this complicated ethnic landscape, the

¹⁹ Ikeya, pp. 70-74.

²⁰ Delap, p. 402.

²¹ Government of India, *Census of India, 1901*, XII, *Burma* (Rangoon: 1902).

²² Yi Li, *Chinese in Colonial Burma: A Migrant Community in A Multiethnic State* (New York, 2017), p. 8.

four young women were conscious of, and often confronted by, the fluidity of their ethnic identity, both in the imperial metropole and back home in Burma.

The First Female Law Student from Burma at an Inn of Court

Coomee Rustom Dantra was the first woman from Burma to gain entry to an Inn of Court. Born on 23 September 1905, to a well-established Anglo-Parsi family in Rangoon, Dantra was the eldest daughter of Rustom Sorab Dantra and Shireen Spencer.²³ Her father had been a member of the Middle Temple since 1892, was called to the Bar in 1896,²⁴ and started to work as an Advocate of the Chief Court in Rangoon from April 1900.²⁵ Her grandfather Sorab H. Dantra was the Surgeon-Major of Mandalay of the Indian Medical Service.²⁶ With the family's long connection to Burma, Coomee divided her time growing up in Burma, India and Britain. She received her initial education at Queens Hill High School, Darjeeling.²⁷ She headed for England and enrolled in South Hampstead High School, an elite girls' school in Hampstead, North-west London, some time around 1919.²⁸ On 5 January 1924, nearing the completion of her high school studies, she set out to seek admission to the Inner Temple.²⁹ The headmistress of her high school and a highly respected English-qualified barrister from Burma provided enthusiastic recommendations in support of Dantra's application for admission. Dorothy Walker, Headmistress of South Hampstead High School in London, provided her with a letter of testimonial early that same year.³⁰ Walker had '...known [Dantra] through the whole of her course in the upper school; during the year 1922-23, she was one of our best pupils and she is now Head Girl'.³¹ More importantly, Dantra had a family friend who was an English barrister at law and a senior member of the Burmese Bar to back her application. Bomanje Cowasjee, a member of Lincoln's Inn,³²

²³ Newnham College, *Newnham College Register*, Volume 2, 1924-1950 (Cambridge, 1981), p. 3.

²⁴ Herbert Arthur Charlie Sturgess, Honourable Society of The Middle Temple, *Register of Admissions to the Honourable Society of the Middle Temple: From the Fifteenth Century to the Year 1944* (London, 1949), p. 689

²⁵ Thacker's Indian Directory (Calcutta, 1920), available from: <https://abldirectories.weebly.com/1920-law.html>.

²⁶ Sturgess, p. 689.

²⁷ Newnham College.

²⁸ Ibid.

²⁹ Inner Temple Archives, Coomee Rustom Dantra's Admission and Call File.

³⁰ Ibid.

³¹ Ibid.

³² Ibid. He was called to the Bar on 3 June 1892.

furnished a letter of testimonial vouching for her fitness to be admitted a law student. 'I have known her since her infancy. She has lived with me & near me until she came to England & since then she has spent her vacations with me & I have been in close touch with her',³³ he wrote. On the strength of these documents, the Inner Temple admitted Dantra on 14 January 1924, making her the first woman from Burma admitted to the Inns of Court.³⁴

Meanwhile, aside from her studies at the Inner Temple, Dantra also had completed her high school with a distinguished record and gained the opportunity to study at Newnham College, Cambridge University in 1924.³⁵ Perhaps because she had to juggle both studies at the university and the Inn, she was not the first woman from Burma to be called to the Bar despite being the first to have gained admission to an Inn of Court. She first passed the requisite university exams to receive the titular degree of Bachelor of Arts in Law at Newnham College, Cambridge University in 1928,³⁶ before she got called to the Bar on 26 January 1928, as the third woman barrister from Burma.³⁷ On her return to Burma, she practiced law as a barrister at the Rangoon High Court from 1928 to 1934.³⁸ On 30 January 1932, she married a Dutch national, Jacob Cornelis Strooker.³⁹ From 1939 to 1945, she worked as a translator charged with translating French, German, and Dutch into English for publishing projects.⁴⁰ She would go on to translate for the International Military Tribunal for the Far East in Tokyo in 1946, where Dantra, described as a 'Dutch attorney', was one of several women attorneys employed to assist the prosecution of cases.⁴¹ According to Dantra's description, she was mainly involved in the translation service from Dutch to English for the Netherlands Prosecution Section of the Tribunal.⁴² After the Tokyo Trial, it appears that Dantra continued her translation work for various Dutch ministries from 1946 to 1955.⁴³

³³ Ibid.

³⁴ Ibid.

³⁵ Newnham College.

³⁶ Ibid., She passed the Law Tripos Part I exam with a second class (lower division) in 1926 and completed the Part II exam with a third class in 1927.

³⁷ Coomee Rustom Dantra's Admission and Call Files.

³⁸ Newnham College.

³⁹ Ibid.

⁴⁰ Ibid.

⁴¹ Kerstin von Lingen, *Transcultural Justice at the Tokyo Tribunal: The Allied Struggle for Justice, 1946-48* (Leiden, 2018), p. 14.

⁴² Newnham College.

⁴³ Ibid.

The First Burmese Woman Barrister

The second woman who ventured westward to receive a toehold at the English Bar was Ma Pwa Hmee.⁴⁴ Pwa Hmee was born in 1902 to a privileged Burmar family in Rangoon. She was the eldest daughter of M. Tun Baw, a tax collector of the Rangoon Municipal Corporation.⁴⁵ The humanistic Pwa Hmee desired to become a lawyer not to seek personal gains but to benefit the women of Burma. A fierce advocate of women's rights, she believed that 'many Burmese girls were well educated, but were too timid to take up public work and needed encouragement'.⁴⁶ Pwa Hmee received her secondary education at St. John's Convent in Rangoon⁴⁷ and studied at Rangoon University thereafter.⁴⁸ She left for England before completing her undergraduate studies and arrived in London in September 1923.⁴⁹

With resources at her disposal, she was able to hire a private tutor in London to help with her preparations. Despite being a foreigner to the land, she managed to navigate the labyrinth of admission procedures to become a member of an Inn of Court in London. She produced strong letters of testimonial in support of her application, which effectively paved the way to unlock the door to the Inner Temple. Pwa Hmee (or more likely her family) had arranged for a professor at Rangoon University to write to Harvey Adamson, former Lieutenant Governor of Burma, to offer his assistance to Pwa Hmee in securing admission to an Inn of Court.⁵⁰ In support of this endeavour, Adamson wrote a persuasive letter of recommendation advocating for her admission to the Inner Temple to become the first Burmese woman lawyer:

I have become acquainted with Ma Pwa Hmee only upon her arrival in England, but I have received a letter from a friend in Burma, a Professor in Rangoon University, from which I have every reason to believe that she bears an excellent

⁴⁴ As a pioneering figure in Burmese legal history, she has been frequently mentioned in books published in and about Burma. The English spelling of her name varies, for instance, Ikeya uses the form 'Pwa Hmi' (Ikeya, p. 56), while Than uses the same spelling of 'Pwa Hmee' as here (Than, p. 65).

⁴⁵ Inner Temple Archives, Ma Pwa Hmee's Admission and Call Files.

⁴⁶ 'Encouragement Needed, Burmese Girls and Public Work', *The Times of India*, 19 November 1926, p. 10.

⁴⁷ Ran kun Takkasuil, *Ran kun Takkasuil nhacnachay, 1920-70* (Rangoon, 1970), p. 1.

⁴⁸ 'Burma's First Lady Barrister', *The Singapore Free Press and Mercantile Advertiser*, 10 February 1927, p. 14.

⁴⁹ *The Daily Telegraph*, 18 November 1926, p. 11.

⁵⁰ Ma Pwa Hmee's Admission and Call Files.

character and is a very deserving Burmese lady. Her family is well known & respected in Burma. Her father holds a position of trust in Rangoon Municipality. Ma Pwa Hmee has come to England to study for the Bar, an enterprise which I believe no other Burmese lady has hitherto undertaken. From what I see and hear I am confident that she is worthy of encouragement.⁵¹

Upon Pwa Hmee's arrival in London, Joseph Allan Watson, a graduate of London University and a barrister at law called to the Bar by the Inner Temple in 1916, was hired to tutor her in English language, English history and Latin, all of which were requisite subjects for the preliminary examination for admission as a law student.⁵² After five months' hard work with Watson, the latter became confident that Pwa Hmee was in every respect qualified for admission as a law student. On 5 January 1924, he wrote an enthusiastic letter in support of Pwa Hmee's application to his Inn:

Miss Pwa Hmee who has been reading with me for the past five months has asked me to certify as to the standard of her general education and as to her fitness to be admitted as a student of your Inn. I have pleasure in doing so for I have been most favourably impressed with her character and attainments generally. She has an excellent knowledge of English and all the requisite subject except Latin is quite up to the standard required for the entrance examination of our universities. I trust the Masters of the Bench will find themselves able to consider her application favourably.⁵³

At that time, it was customary for an applicant only to provide two letters of reference.⁵⁴ To increase her chances of gaining admission to the Inner Temple, however, Pwa Hmee procured a third testimonial from Maung Ba So, First Class Magistrate of Burma, who stated that '[Pwa Hmee] has been known to me personally for upwards of two years, I have been her personal friend.'⁵⁵ Pwa Hmee completed her application on 7 January 1924, and was admitted by the Inner Temple on 21 January 1924,⁵⁶ just a week after its historic admission of its first female student from Burma, Dantra.

⁵¹ Ibid., Signed as Harvey Adamson, Lieutenant Governor of Burma (1910-15) 5 January 1924.

⁵² Ibid.

⁵³ Ibid., Signed Jos. A. Watson BSc. Tutor.

⁵⁴ Based on viewing numerous student admission files at the Inns of Court in London for the relevant periods.

⁵⁵ Ma Pwa Hmee's Admission and Call Files.

⁵⁶ Ibid.

Pwa Hmee was one of the three women who passed the Michaelmas bar final examination in November 1926.⁵⁷ However, on the Call Night of 17 November 1926, Pwa Hmee was one of the only two women to be called to the Bar.⁵⁸ This event attracted the media's attention. When a reporter interviewed Pwa Hmee, his questions steered her to a human-interest matter rather than her professional achievements or aspirations. Nevertheless, she gave a vivid description of London and the Londoners through the eyes of a young Burmese woman in the imperial metropole, disoriented yet full of excitement:

Never in my life, had I seen people in such a hurry as those tearing down the streets of London. I thought that their haste must be due to some special attraction in the next street. In one of the busy streets of the West End I remember waiting five or ten minutes to cross the road, and expecting the traffic to wait for me. Another of my difficulties was in understanding the language of the bus conductor, who several times told me to 'Ole tight!'⁵⁹

As a woman from a foreign land, she also held some distinct views about the local British girls' dress: 'They have none of the daintiness of our national costume; but of course, our dress would be ridiculous here, for we wear skirts down to our ankles, and we could not possibly run to catch buses and trains as British girls do.'⁶⁰ She greatly admired 'the bearing of the British people, their erect bodies and even strides, which show they have loved for generations long walks in the open air'.⁶¹ Another article revealed that Pwa Hmee would return to Burma, where 'she intends to practise and work among the women in her native city'.⁶² On the English media, this young woman from a remote, exotic colony, despite her high professional accomplishment, was expressing her admiration for Great Britain for its symbolic technological advancement (trains and buses) and bodily advantage (long walks), implying a sharp contrast back home. It is also worth noting that journalists, on behalf of their readers, were curious about Pwe Hmee, a barrister at law's view on fashion, which must have been regarded as an appropriate domain for women regardless of their standings in society. The

⁵⁷ 'Far and Near', *Daily Mail*, 1 November 1926, p. 7.

⁵⁸ 'K. C. s and Their Sons', *Daily Mail*, 18 November 1926, p. 10. Eileen Agnes Macdonald, LLB of Manchester, was also among the list.

⁵⁹ 'Woman Barrister from Burma', *Dundee Courier*, 10 December 1926, p. 12.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² *The Daily Telegraph*, 18 November 18 1926, p. 11.

imperial and gender hierarchy, and its broad consensus among the imperial and colonial public, were on blatant display here.

In December 1926, Pwa Hmee boarded the steamer *Pegu* bound for Rangoon from Liverpool.⁶³ She made a triumphant return to Rangoon and laid claim to the distinction of being the first woman called to the Bar in Rangoon. On 26 January 1927, '[a] large gathering of the members of the Bar and several outsiders including a few ladies assembled to witness a brief but pleasing ceremony of enrolment in the Burma High Court of Miss Ma Pwa Hmee'.⁶⁴ Pwa Hmee had appeared before the Chief Justice, Sir Guy Rutledge, for the enrolment in the bar list.⁶⁵ Mr. Gaunt, the senior Government advocate, introduced and moved her Call.⁶⁶

The exciting news of her admission to the Bar was also picked up by some American newspapers. In a celebratory tone, they reported on the unusual achievement made by Pwa Hmee:

Burma, known as the land of the pigeon blood ruby and of the tinkling bells made famous by Kipling, has taken another step in its stride toward women's rights. Ma Pwahee[sic], daughter of a Burmese official of the Rangoon municipality, is the first Burmese woman barrister. Ma Pwahee[sic] is the only Burmese woman to adopt the law as a profession.⁶⁷

Eight years later, in February 1935, Pwa Hmee made history again when she was appointed 'one of the first Honorary Magistrates (First Class) in Rangoon.'⁶⁸

Pwa Hmee later married U Myint Thein, who came from an eminent Mandalay family⁶⁹

⁶³ Board of Trade: Commercial and Statistical Department and successors: Outwards Passenger Lists. BT27. Records of the Commercial, Companies, Labour, Railways and Statistics Departments. Records of the Board of Trade and of successor and related bodies. The National Archives, Kew, Richmond, Surrey, England.

⁶⁴ 'Burma's First Lady Barrister'.

⁶⁵ *The Times*, 27 January 1927, p. 11.

⁶⁶ *Ibid.*

⁶⁷ 'Burmese Woman Lawyer', *Woodland Daily Democrat*, 26 January 1927, p. 4.

⁶⁸ 'Burma's Portia', *The Straits Times*, 5 March 1935, p. 19. 'Rangoon Feb 19, Daw Pwa Hmee, Barrister-at-law, who has been appointed one of the first Honorary Magistrates (First Class) in Rangoon, is the first lady Barrister in Burma. She is the wife of U Myint Thein, Barrister-at-law, Public Prosecutor, Rangoon.'

⁶⁹ 'U Myint Thein', *The Times*, 6 October 1994, p. 19.

and was educated at Rangoon University and Queens' College, Cambridge University.⁷⁰ He was also a barrister at law and was called to the Bar by Lincoln's Inn in 1925.⁷¹ Subsequently, U Myint Thein became an internationally acclaimed diplomat. He was appointed to the Bench of the Supreme Court of Burma and was made its Chief Justice from 1957 until March 1962, when General Ne Win gained power as the leader of a military government in a coup d'état,⁷² imprisoned U Myint Thein. Pwa Hmee passed away on 26 June 1962, while her husband was still in detention.⁷³

Daughters of Rangoon's Esteemed Families of Lawyers

The third and fourth women barristers from Burma were both born to eminent families of lawyers in Rangoon. Several months after Dantra and Pwa Hmee made history by gaining admission to the Inner Temple, a third woman went to the Middle Temple to seek admission in November 1924. Born in 1901, Sarah Dhar was the third daughter of Surat Chandra Dhar, an influential and affluent lawyer in Rangoon.⁷⁴ Her father had sent two of her elder brothers, William and John, to England to obtain legal education in 1907 and 1909. The Lincoln's Inn subsequently admitted both.⁷⁵ William and John were called to the Bar on 10 May 1911⁷⁶ and 19 June 1912,⁷⁷ respectively. By 1920, both brothers were back to Rangoon, practising as Advocates of the Chief Court.⁷⁸

Even with three family members as English barristers, Sarah took nothing for granted when it came to her application to an Inn of Court. She was armed to the teeth with three strong letters of testimonial to facilitate her admission like her predecessors. Sarah was notable as one of the first women to receive and complete a university education at the Rangoon University in the early 1920s. Established in 1920, Rangoon University provided a full university education for the colony of Burma. This meant that Sarah, unlike her predecessors, did not have to travel to India or Britain, or rely on personal tutorials, to qualify for further legal education. Duncan John Sloss, Principal of the

⁷⁰ Ibid.

⁷¹ Ibid.

⁷² Ibid.

⁷³ Ibid.

⁷⁴ Ibid.

⁷⁵ Lincoln's Inn, p. 92. William also studied at Christ's College, Cambridge University as an undergraduate student.

⁷⁶ Ibid., p. 438.

⁷⁷ Ibid., p. 439.

⁷⁸ Thacker.

University of Rangoon, provided her with the first letter of testimonial, stating that ‘Miss S. Dhar passed the B.Sc. Examination of the University of Rangoon in 1924. She desires to read law to qualify to be called to the Bar. I can testify to her character and abilities.’⁷⁹ Sarah had taken a contracts law course with Jehangir Cowasji Bilimoria, an English barrister at law⁸⁰ and law lecturer in Rangoon. His letter stated that ‘I have known Miss S. Dhar as a law student from June to September 1924 when she attended my class on Contracts. In my opinion she is a fit person to be admitted as a law student in an Inn of Court’.⁸¹ Sarah’s final letter of testimonial was from the Collector of Rangoon, a sign of her family’s high standing and close connections with the local elites. It stated that ‘Miss Sarah Dhar, B.Sc., is daughter of S. Dhar, an old Advocate of Rangoon, whom I have known for a long time. Miss Sarah Dhar appears to have borne good character. She is going to England to study law’.⁸² With this endorsement, Sarah filed her application form to the Middle Temple on 14 November 1924 and was admitted the very next day.⁸³

In June 1927, Sarah was among six women called to the Bar.⁸⁴ She and Isabel Cogan of Carshalton, Surrey, were the only two women called at the Middle Temple that term.⁸⁵ Sarah became the second woman from Burma to achieve this distinction in history. She sailed home on 19 August 1927, from London.⁸⁶ After Burma became an independent country in 1948, Sarah emigrated to Canada and passed away in Ottawa on 30 October 1987.⁸⁷

The fourth woman called to the Bar was Goolbanoo Nanabhai Cowasjee, also known as Goolbanoo Nanabhoy Cowasji. She was born on 24 July 1908, in London.⁸⁸ As the second daughter of Nanabhoy Merwanjee Cowasjee, also known as Nanabhoy Merwanjee Captain, she came from one of the most powerful, well-to-do Parsi families

⁷⁹ Middle Temple Archives, Sarah Dhar’s Admission and Call File.

⁸⁰ Bilimoria was a barrister at law called to the Bar on 17 November 1903, at the Lincoln’s Inn.

⁸¹ Sarah Dhar’s Admission and Call File. Signed J.C. Bilimoria, BA. Barrister at Law, Law Lecturer and dated 16 September 1924.

⁸² Ibid. Office of the Collector of Rangoon, dated 23 September 1924.

⁸³ Ibid.

⁸⁴ ‘Calls to the Bar’, *The Daily Telegraph*, 25 June 1927, p. 15.

⁸⁵ Ibid. Six women were among the hundred law students to be called to the Bar.

⁸⁶ Board of Trade.

⁸⁷ Ottawa, Canada, Beechwood Cemetery Registers, 1873-1990. Name Sarah Dhar, Birth Rangoon, Burma, 16 December 1901, Death 30 October 1987.

⁸⁸ Newnham College, p. 75.

in Rangoon.⁸⁹ Goolbanoo completed her first degree in Burma and was said to have ‘graduated first at Rangoon University’.⁹⁰ Her father had studied law at St John’s College, Cambridge University, and received his BA degree in 1894.⁹¹ At the same time, he had also joined the Inner Temple as a law student in January 1891 and was called to the Bar three years later.⁹² With such an impressive background, gaining admission to an Inn of Court was undoubtedly a less challenging task for Goolbanoo. Like the family of Sarah, five years before Goolbanoo’s admission to the Lincoln’s Inn, her father had the experience of arranging the admission of her elder brother Framroze Nanabhoy Cowasjee to the same Inn in May 1925.⁹³ When she applied to Lincoln’s Inn for admission on 30 October 1930, she was offered admission less than a week later.⁹⁴ Notably, the Inn waived the usual bond requirement in her case,⁹⁵ a sign of her family’s high standing and connections in London.

In addition to studying at the Inn, Goolbanoo also matriculated at Newnham College, Cambridge University in 1930. This was unsurprising. Considering that her father and brother⁹⁶ were both Cambridge graduates, this would have been an apparent family tradition that she was motivated to maintain.⁹⁷ Goolbanoo was known as a popular student leader who ‘made lots of friends’ while serving as president of the Cambridge *Majlis*.⁹⁸ The Cambridge *Majlis*, established in 1891, was influential among Indian students in Britain for its social and political debates, often joining nationalist and independence struggles at home.⁹⁹ It was reported that the student society ‘was extraordinarily active’¹⁰⁰ under Goolbanoo, a female Parsi student from Burma, indicating a wide network that embraced the diversity of British India (including Burma). She completed the prescribed course of study in history at Cambridge and

⁸⁹ See Mitra Sharafi, *Law and Identity in Colonial South Asia: Parsi Legal Culture, 1772-1947* (Cambridge, 2013).

⁹⁰ ‘Indian Affairs in London’, *The Times of India*, 15 July 1935, p. 14.

⁹¹ John Archibald Venn, *Alumni Cantabrigienses: A Biographical List of All Known Students, Graduates and Holders of Office at the University of Cambridge, from the Earliest Times to 1900*, Volume 2, *Part I* (Cambridge, 2011), p. 509.

⁹² Inner Temple Archives, Historical Admission Register.

⁹³ Lincoln’s Inn, p. 184.

⁹⁴ *Ibid.*, p. 229.

⁹⁵ Lincoln’s Inn, Goolbanoo Nanabhai Cowasjee’s Admission and Call File.

⁹⁶ Her brother had followed in the footsteps of their father and studied at St Catherine College, Cambridge University.

⁹⁷ Lincoln’s Inn, p. 229.

⁹⁸ ‘Indian Affairs in London’, *The Times of India*, 22 July 1935, p. 15.

⁹⁹ Rozina Visram, *Asians in Britain: 400 Years of History* (London; Sterling, VA, 2002), pp. 78-79.

¹⁰⁰ *Ibid.*

received her titular degree of Bachelor of Arts in 1935.¹⁰¹

Goolbanoo was called to the Bar on 3 July 1935¹⁰² and soon sailed home on the *Rajputana*¹⁰³ to realise her plans to ‘work under her father, who [was] a barrister practising at the High Court.’¹⁰⁴ In December 1935, she was admitted to the Rangoon High Court with Government Advocate Arthur Eggar having moved her Call.¹⁰⁵ She eventually worked as a barrister at law at the firm of Cowasjee, Anklesaria & Jeejeebhoy in Rangoon.¹⁰⁶ She was later a legal advisor to Tata Industries Private Ltd in Bombay.¹⁰⁷

From the brief biographical sketches above, it is clear that all four women were from extremely privileged families in Rangoon, who possessed social and financial resources, including connections across the Empire. Like their male relatives, they belonged to the colonial elites, with ‘access to wealth, conversant in English, and educated in India or Britain’.¹⁰⁸ These factors, among others, enabled them to take advantage of the legal and social changes in the interwar years to pursue their professional career. However, being members of a social class that could afford the rare resource of overseas higher education,¹⁰⁹ these privileged women often faced ‘tighter family restrictions’,¹¹⁰ which can be glimpsed through their marriages and later lives when their fates were too often tied to those of their husbands.

Moreover, being ‘colonial subjects who travelled to Britain’,¹¹¹ our protagonists’ cosmopolitan sense played an interesting part in their fluid and ever-changing identity. In the imperial metropole, they were inevitably perceived as the cultural and ethnic *other*, albeit a clever, well-connected, and wealthy *other*, by the surrounding

¹⁰¹ Newnham College, p. 75.

¹⁰² Lincoln's Inn, p. 763.

¹⁰³ ‘Indian Affairs in London’, *The Times of India*, 15 July 1935, p. 14.

¹⁰⁴ Ibid.

¹⁰⁵ ‘Woman Barrister, Enrolment in Rangoon High Court’, *The Straits Times*, 16 December 1935, p. 8.

¹⁰⁶ Newnham College, p. 75.

¹⁰⁷ Ibid.

¹⁰⁸ Sumita Mukerjee, *Indian Suffragettes: Female Identities and Transnational Networks* (Oxford, 2018), p. 27.

¹⁰⁹ It is important to remember that although higher education opened new opportunities for them, education was limited both by number and in nature. It was a rare type of education that excluded the majority of women in Burma at the time.

¹¹⁰ Than, p. 50.

¹¹¹ Mukherjee, p. 19.

environment. This can be clearly seen from the British media coverage of Pwa Hmee, as well as in all four cases, where the extra efforts, and the underlying anxiety to secure admissions to the Inns of Court are noteworthy. Goolbanoo's case is especially significant: acutely conscious of her multiple identities, she strengthened her attachment to colonial India by actively participating in the *Majlis*, deeply caring for the political future of India.

Taming the Bar Examination

These four pioneers experienced varying levels of successes and failures at the Bar Exam. At that time, there were four exams held every year, which were held in the Hilary, Easter, Trinity, Michaelmas terms.¹¹² The Bar Exam comprised two parts, and students had to pass both to receive their certificate of fitness for Call to the Bar.¹¹³ In the 1920s, Part I of the exam consisted of 4 subjects, which could be taken separately or together 'at any time after admission'.¹¹⁴ These were: Roman Law, Constitutional Law (English and Colonial) and Legal History, Criminal Law and Procedure, and Real Property and Conveyancing (or Hindu and 'Mahomedan' Law or Roman-Dutch Law). Part II consisted of the final exam, where students had to successfully pass four papers in the same exam sitting:¹¹⁵ (a) Common Law; (b) Equity; (c) Law of Evidence and Civil Procedure; and (d) a general paper on the three subjects described above.¹¹⁶

The grades of the students were all recorded in an examination register.¹¹⁷ In particular, the names of the successful students obtaining Class I and Class II would be recorded in accordance with merit.¹¹⁸ Such information provides a window into the academic aptitude of the four women from Burma. It offers some insight as to their performance in comparison to each other and as against their counterparts of both sexes and from across the Empire. From the records, it appears that all four of them had confronted failures in completing the battery of examinations for passing the Bar. For instance,

¹¹² Council of Legal Education, Consolidated Regulations of the Several Societies of Lincoln's Inn, The Middle Temple, The Inner Temple, and Gray's Inn as to the Admission of Students, the Education and Examination of Students. Revised 17th, 1924. Rule 19.

¹¹³ *Ibid.*, Rule 21

¹¹⁴ *Ibid.*

¹¹⁵ *Ibid.*, Rule 25

¹¹⁶ *Ibid.*, This General Paper consisted of three individual parts.

¹¹⁷ Council of Legal Education, Council of Legal Education Examination Performance Record.

¹¹⁸ *Ibid.*, Rule 28.

Pwa Hmee and Goolbanoo each failed the Final Examination once. As for the individual papers, it seemed that the Criminal Law and Procedure paper were the most challenging for these women students since all except Sarah failed it once. Pwa Hmee and Sarah also failed Real Property and Conveyancing once. Under the new exam regulations, Goolbanoo failed the Elements of Contract and Tort paper once. All in all, Dantra had achieved the best overall performance in the Bar Exam, for she was among a small number of examinees to have obtained second-class honours in the final examination in Hilary term 1928, and did so on her first attempt. Her systematic study of law at Cambridge University could probably explain why she alone achieved notable success in the exam.¹¹⁹ Even though Goolbanoo had received education at both the University of Rangoon and at Cambridge, she displayed the weakest performance at the Bar Exam. She only read history at Cambridge, revealing that she did not have the advantage of Dantra in receiving a thorough preparation in the study of law. A comparative table of the scores of these four female barristers from Burma can be found in the Appendix.

Some of these women had impressive results that are nevertheless worth singling out for mention. For example, in the final examination of Hilary term 1928, there were 108 candidates, but only 90 eventual passes.¹²⁰ Seven students achieved Class I results, and 34 students scored Class II results in the final examination.¹²¹ Dantra scored a Class II result, ranking 14th out of the 34 students of that class.¹²² Another success story worth mentioning is Pwa Hmee's score of 94 on her first attempt of the Roman Law exam in Michaelmas 1924. In the pool of 112 students, six scored Class I results and 26 received Class II results, including Pwa Hmee. In particular, Pwa Hmee did well enough to be placed 12th on the Class II merit list,¹²³ outperforming three male Burmese students on that list, all of whom were graduates of the BA degree programme from Rangoon University.¹²⁴ Finally, despite the initial failures of Pwa Hmee and Sarah in the Real Property and Conveyancing paper,¹²⁵ they distinguished themselves by scoring Class

¹¹⁹ Ibid., Rule 23. Also, Dantra was the only one among the four women who obtained an exemption from the Roman Law exam by presenting a certificate to show that she had passed an exam in the subject during her university studies.

¹²⁰ *The Law Times*, 21 January 1928, Volume 163-65.

¹²¹ Ibid.

¹²² Ibid.

¹²³ Ibid.

¹²⁴ *The Law Times*, 8 November 1924, Volume 158-379. They were Maung Ba Maung, Maung Chin Tun, and Maung Ba Thin.

¹²⁵ In Trinity term 1925, Pwa Hmee failed it with 53 marks, 7 marks short of a pass. In Easter 1926,

II results in their second attempts.¹²⁶ When Pwa Hmee took this exam in Trinity term 1925, only 108 out of 134 students passed it.¹²⁷ Ten students achieved Class I results, and 29 received Class II results. Pwa Hmee was ranked 13th in the Class II group.¹²⁸ As for Sarah, she impressively made it to the third position out of 14 Class II recipients in her second attempt at this exam in Easter term 1926.¹²⁹

Advocacy for Burmese Women's Political Equality

Having obtained impressive qualifications in the imperial metropole and returned to Burma, these pathbreaking women lawyers set off to utilise their legal knowledge and advocacy skills for the advancement of women's rights at home. Shortly after their return to Burma, Dantra and Pwa Hmee joined a women's deputation to the Indian Statutory Commission, or the Simon Commission, whose task was to evaluate the implementation of the 1919 Montagu–Chelmsford Reforms, which went into effect in Burma in 1923. These reforms aimed to promote broader political participation and limited self-rule in British India. The Simon Commission visited Rangoon in early 1929. They interviewed representatives of the public and invited memoranda from across the political, religious, and ethnic spectrum. On 6 February 1929, the 'deputation of ladies' met the Commission, lobbying for equal rights for women in Burma, as part of the colonial subjects in Burma, to participate in law-making and political governance.¹³⁰

Advocacy for female rights in British Burma emerged shortly before the twentieth century. Two generations earlier, Ma May Hla Oung, daughter of a general of the Burmese Kingdom, wife of a high-ranking colonial official, and mother of a barrister at law of the Middle Temple,¹³¹ was instrumental in widening female education. In 1896, along with her husband, she founded two Buddhist schools – one for 400 girls and another for 250 boys respectively – which she proudly described as 'the only ones

Sarah Dhar failed it with 47 marks.

¹²⁶ Council of Legal Education.

¹²⁷ *The Law Times*, 31 October 1925, Volume 160-327.

¹²⁸ *Ibid.*

¹²⁹ *The Law Times*, 5 June 1926, Volume 161-451. In this sitting, 51 out of 77 candidates passed the exam, of which four scored first-class results.

¹³⁰ His Majesty's Stationery Office, Indian Statutory Commission, Volume XVII, *Selections from Memoranda and Oral Evidence by Non-Officials*, Part II, (London, 1930), pp. 454-456.

¹³¹ 'Bah Hla Oung', Arnold Wright, ed., *Twentieth Century Impressions of Burma: Its History, People, Commerce, Industries, and Resources* (London, 1910), p. 64.

of their kind in Rangoon'.¹³² Although her contribution was 'noted with interest' in Europe, and despite her extensive connections with the high societies of colonial India and imperial Britain, including King Edward VII and Queen Victoria, her 'potential challenge to European gender norms' was refused, and her voice fell on deaf ears 'in the Anglo-American feminist or suffrage press'.¹³³

The struggle continued in the following century by a new generation of women who acted with their own agency in a professional manner, and aligned their cause with political and social changes of the time and across the Empire. In 1927, Independent Daw San, a prominent female educator, journalist, and writer from Mandalay,¹³⁴ and Mya Sein, then a recent graduate of Rangoon University, led a women's demonstration on the premises of major government buildings in central Rangoon.¹³⁵ They were there to support legislative reform to allow women to stand for parliamentary elections,¹³⁶ echoing both the nationalist campaign for political rights for the Burmese, and women's suffrage in other parts of British India. Like our four protagonists, Mya Sein came from an elite Burmar family. Her father, May Oung, was a leading lawyer and politician who graduated from Cambridge, and was called to the Bar at the Lincoln's Inn in 1907.¹³⁷ He was one of the founders of the Young Men's Buddhist Society (YMBA) in 1906, the leading nationalist organisation in Burma. In the post-1923 Burmese government where the Montagu–Chelmsford Reforms were implemented, U May Oung was the Home Minister, one of the few non-British officials to share political power on behalf of the local population, albeit to a limited extent. Following her father's footsteps, Mya Sein pursued a Master's degree at Oxford in 1927.¹³⁸ Later, Mya Sein, being the only female delegate at the 1931 Burma Round Table Conference in London that sealed the separation between Burma and India, would continue to call for political rights for women, and remained the leader of female education and women's rights in post-independence Myanmar.

¹³² Wright, p. 507.

¹³³ Delap, pp. 404-405.

¹³⁴ Ikeya, p. 59.

¹³⁵ Ikeya, pp. 90-91.

¹³⁶ The resolution taking part in the Legislative Council on this occasion was unsuccessful, lost by 45 votes (including the official vote) to 81. Indian Statutory Commission, Volume XVII, pp. 454-455.

¹³⁷ Wright, p. 64.

¹³⁸ Ikeya, p. 57.

On the occasion of the 1929 Simon Commission, Dantra and Pwa Hmee were among an eight-member, all-female group to be interviewed by the Commission. Half of the members were ethnic Burmar, while the rest were two Indians, one English and one Anglo-Indian (Dantra). Among them were the very first female medical (Saw Sa), legal (Dantra and Pwa Hmee) and educational (Mya Shwe) professionals, as well as a scholar-activist (Tee Tee Luce, wife of the prominent scholar G. H. Luce).¹³⁹ It is also notable that at the very beginning of the session, these women made it explicitly clear that they were ‘not representatives of any body or organisation of women’,¹⁴⁰ drawing a line between themselves, all of whom were working for or with the colonial government, and the various ancillary women’s branches of major nationalist organisations, such as YWBA and *wunthanu athin*, who fought for political rights outside of the Legislative Council.¹⁴¹

Dantra opened the session on behalf of the deputation with a succinct yet poignant address to the all-male Commission:

Since 1922, women have had the power to vote for members of the local Legislation on the same terms as men. However, for seven years, we have been denied the right to choose one of our own sex to represent us, and this is the case in Burma, a country where women have taken an active part in public life for generations... In fact, the Burmese woman is perhaps... more thrifty and industrious than the Burman. Yet, while in India most of the provinces have enfranchised women completely by allowing them to vote as well as to sit on the local Legislatures, yet in this province... we are only allowed to vote for men to speak for us.

... [W]e submit, though humbly, that we have a contribution to make towards the welfare of social life. We are, by reason of our sex, more fitted to deal with certain problems of a social character – Housing, Health and Hygiene and Education of children...

Our main grievance is that we women in Burma must, and are willing to, shoulder our responsibility towards the next generation and the welfare of the State in general. As things stand at present we are denied our full contribution.¹⁴²

¹³⁹ Indian Statutory Commission, Volume XVII, p. 454; and Ikeya, p. 56.

¹⁴⁰ Indian Statutory Commission, Volume XVII, p. 454.

¹⁴¹ Ikeya, p. 85.

¹⁴² Indian Statutory Commission, Volume XVII, p. 454.

Dantra was keen to stress the equal professional standings of women from Burma, claiming them being ‘just as active as men... in business, and also in the legal profession since the disqualification of women to practise at the Bar was removed. They are equally intelligent, if I may say so, and ready to take a share in the duties of citizenship.’¹⁴³ To conclude, Dantra made a strong remark that drove home her point of striving to attain a true sense of gender equality:

Once the door is open, I want to have just the same space to enter through as men have. I do not ask that it should be wider for us. If we are to fight (I prefer not to call it fighting, but rather working together), we should fight with them on their own grounds; we want a fair field and no favour.¹⁴⁴

As the public voice of the women’s deputation, the well-educated woman barrister Dantra carried herself with dignity and reason. Her stately demeanour made a highly favourable impression upon the observers from as far away as southwest England:

The Burmese feminists, who recently waited upon Sir John Simon and his fellow Indian Commissioners to plead for admission to the local Legislature, chose a remarkable spokeswoman. Their case was ably stated by a young Parsee barrister, Miss Coomee Dantra, for whom some admirers predict an illustrious career in the political sphere.¹⁴⁵

Yet the confident and professional woman barrister could not escape the ethnic scrutiny at this high-profile, highly publicised political stage. Insinuating that her Parsi heritage signalled a detachment from the Burmese culture, one member of the Commission disparaged her understanding of ‘the customs and traditions of the Burmese people’.¹⁴⁶ Faced with this unsound and probably unexpected challenge, the women remained united and unfazed. Tee Tee Luce, the Burmar member, defended Dantra and continued

¹⁴³ Ibid., p. 455.

¹⁴⁴ Ibid., p. 456.

¹⁴⁵ ‘An Eastern High Brow’, *Exeter and Plymouth Gazette*, 20 February 1929, p. 8. ‘Miss Dantra is still in the early twenties, but she had a notable scholastic career. She was educated at a well-known high school for girls in London, and five years ago was head girl as well as captain of her house. She took Bar examination with consummate ease. She was thoroughly popular at school, but, naturally, the flapper wits had to christen her house “Dentra’s Inferno.”’

¹⁴⁶ Indian Statutory Commission, Volume XVII, p. 455.

to robustly reinforce their common belief.¹⁴⁷

Confrontations based on ethnicity were not uncommon in Burmese politics in the interwar years when race played a decisive and divisive role in national politics among colonial officials in the government, and on the street by Burmese nationalists. Lee Ah Yain, a Sino-Burmese barrister of the Lincoln's Inn, and another non-British minister in the post-1923 government, was often challenged by pro-nationalist politicians for his electoral eligibility (he was elected to the Legislative Council by the special constituency of the Chinese Chamber of Commerce) and his capability to lead the Excise Department (whose major responsibility was to regulate the Chinese-dominated opium business).¹⁴⁸ Like Dantra, Lee was not entirely judged by his professional standing and achievements, but for his Chinese heritage, despite his being born and bred in Rangoon. Colonial Burma was an ethnic 'medley' in demography and a 'plural society' on policy papers. Even so, the fraught reality of inter-racial tensions added to the friction and worked in tandem with the development of nationalist movements in interwar Burma and India.

Dantra and Pwa Hmee's involvement in this high-profile operation is an apt example of their motivation for seeking legal education abroad, and the utilisation of the skills they had learned in the metropole. At the same time, their efforts also laid bare the dilemma of colonial perception and policy of women in Burma. Speaking on behalf of her sisters in Burma, who had 'no caste system, no *purdah* ... [and were] not illiterate ... may own property and carry on business on the same footing as men',¹⁴⁹ Dantra reiterated the colonial discourse of women's traditional high status as a reason for equal political rights. Yet like her fellow members in the deputation, Dantra was only able to articulate her objections because of her legal training in the imperial metropole, an opportunity which was largely denied to the very women they were campaigning for. Their experiences only went to show that the process from being disadvantaged to becoming truly 'powerful' was an arduous one. Moreover, even where these young women lawyers were empowered through education, what they accomplished was achieved in an imperial framework that was rooted in and ingrained with colonialism.

¹⁴⁷ Ibid.

¹⁴⁸ Li, pp. 199-206.

¹⁴⁹ Indian Statutory Commission, Volume XVII, p. 454.

The ethnic confrontation faced by Dantra further attested to the complexity, uneasiness, and limitation of the colonial suffrage advocacy that often exhibited ‘imperialist tendencies of control and perpetuated hierarchies.’¹⁵⁰

Conclusion

The British Parliament’s legislative elimination of sex discrimination in 1919 pried open the door for the gradual rise of a generation of women lawyers across the British Empire. For these four pioneering women from Burma, a peripheral colony in Southeast Asia, their successes stand as those of an early stage in the legal profession’s acknowledgment of diversity. They made significant progress that helped advance the difficult process of overcoming gender and racial barriers by demonstrating academic performance on a par with that of their male counterparts from all over the Empire. With the legal knowledge and advocacy skills obtained at the English Bar, these four modern women from Burma were able to fulfil their original vision of using their education to further their cause of fighting for women’s rights and promoting gender equality at home, despite within the colonial framework.

Yet this impressive accomplishment reveals only one side of the story. Their professional development through elite education was made possible in large part owing to their families’ affluence and social standing which gave them unique access to precious resources and indispensable connections. Their success was an exception, not the norm, in British colonies during the interwar years. Moreover, the fact that they were consistently subject to racial and gender confrontations throughout their career, both in the imperial metropole and back home in Burma, in various forms and by multiple actors, indicates the deeply rooted hierarchies at the imperial foundation. By unravelling the unique, previously neglected, and nuanced experiences of women lawyers from Burma in the early twentieth century in a transnational context, this paper hopes to broaden our understanding of colonial legal history, prompt a close examination of the contested nature and intricate relations among gender, education, and ethnicity in the British Empire, and inspire further research to unearth experiences of the disadvantaged with their opportunities and challenges across the Empire.

¹⁵⁰ Mukherjee, p. 25.

Appendix

		Coomee Dantra		Ma Pwa Hmee		Sarah Dhar		Goolbanoo Cowasjee	
	Inn of Court	Inner Temple		Inner Temple		Middle Temple		Lincoln's Inn	
	Attempts	First	Second	First	Second	First	Second	First	Second
A	Roman Law	Exempted		Michaelmas 1924, Class II		Easter 1925, Class III		Trinity 1934, Class III	
	Part 1			46		49		44	
	Part 2			48		27		21	
	Total			94		76		65	
B	Constitutional Law & Legal History	Michaelmas 1926, Class III		Easter 1925, Class III		Michaelmas 1926, Class III		Hilary 1933, Class III	
	Part 1	43		33		42		37	
	Part 2	34		36		43		26	
	Total	77		69		85		63	
C	Criminal Law & Procedure	Michaelmas 1926, Failed	Michaelmas 1927, Class III	Trinity 1924, Failed	Michaelmas 1924, Class III	Easter 1925, Class III		Trinity 1934, Failed	Michaelmas 1934, Class III
	Part 1	31	34	39	50	43		28	41
	Part 2	21	32	13	29	32		25	29
	Total	52	66	52	79	75		53	70
D	Real Property and Conveyancing (or its alternative)	Michaelmas 1927, Class III		Trinity 1925, Failed	Michaelmas 1925, Class II	Easter 1926, Failed	Trinity 1926, Class II	Hilary 1935, Failed	Trinity 1935, Class III***
	Part 1	38		30	47	26	48	ABSENT	42
	Part 2	29		23	47	21	45	ABSENT	15
	Total	67		53	94	47	93	ABSENT	57

E	Common Law	Hilary 1928, Class II		Trinity 1926, Failed	Michaelmas 1926, Class III	Easter 1927, Class III		Hilary 1935, Failed	Trinity 1935, Class III
	Part 1	60		19	13	54		23	40
	Part 2	56		24	42	45		18	40
	Total	116		43	55	99		41	80
F	Equity	Hilary 1928, Class II		Trinity 1926, Failed	Michaelmas 1926, Class III	Easter 1927, Class III		Hilary 1935, Failed	Trinity 1935, Class III
	Part 1	56		30	38	36		ABSENT	27
	Part 2	56		20	65	44		ABSENT	31
	Total	112		50	103	80		ABSENT	58
G	Evidence & Civil Procedure	Hilary 1928, Class II		Trinity 1926, Failed	Michaelmas 1926, Class III	Easter 1927, Class III		Hilary 1935, Failed	Trinity 1935, Class III
	Part 1	40		29	22	45		ABSENT	26
	Part 2	44		40	41	45		ABSENT	33
	Total	84		69	63	90		ABSENT	59
H	General Paper	Hilary 1928, Class II		Trinity 1926, Failed	Michaelmas 1926, Class III	Easter 1927, Class III		Hilary 1935, Failed	Trinity 1935, Class III
	Part 1	42		23	20	17		ABSENT	10
	Part 2	55		30	55	40		ABSENT	30
	Part 3	22		31	43	26		ABSENT	20
	Total	119		84	118	83		ABSENT	60
	Regulations Applicable:	Old		Old	Old	Old		New	New
	Final Exam	Items E to		Items E	Items E to	Items E to		Items	Items D

	consists of:	H		to H	H	H		D to H	to H
	Final Exam Grade:	431		246	339	352		41	314

*** There were three classes of grades for each examination, namely Class I, Class II, and Class III. The students had to make a minimum of Class III to pass the exams. A note on the Registry suggests that Goolbanoo Cowasjee took the alternative Roman-Dutch Law instead of Real Property Law.